

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS

EL PASO DIVISION

RE:	*	Chapter 7
	*	
JOSE A. DE SANTIAGO and wife	*	
JOSEFINA VELEZ DE SANTIAGO	*	
	*	
Debtors	*	BANKRUPTCY NO. 20-30541-HCM

RESPONSE TO TRUSTEE'S OBJECTION
TO EXEMPTIONS

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

COMES NOW, JOSE A. DE SANTIAGO and JOSEFINA VELEZ DE SANTIAGO, Debtors, and files this Response to the Trustee's Motion Objection to Exemptions, and will show the Court the following:

I.

Debtors admit the provisions in paragraph 1 of the objection to exemptions.

II.

Debtors admit the provisions in paragraph 2 to Trustee's objection to exemption.

III.

Debtors admit the provisions in paragraph 3 that Debtor is no longer able to drive his truck due to his health, however, Debtor has a driver that runs the truck for him so that he is able to earn a little extra to help make ends meet with their living expenses.

IV.

Debtors deny the provisions in paragraph 4. Debtor has a driver running the truck for him so that he can earn extra to make ends meet.

WHEREFORE, Debtors pray that the Trustee's Objection to Exemptions should be denied and should allow to exempt the 2013 Freightliner Cascadia and the 2004 Utility Trailer and that Debtors be granted such other and further relief as is just.

Respectfully Submitted,

/s/Edgar J. Borrego

EDGAR J. BORREGO, SBN#00787107

MIGUEL A. FLORES, SBN#24036574

Attorneys for Debtors

2610 Montana Ave.

El Paso, TX 79903

(915) 566-4300 Office

(915) 566-1122 Fax

efile@tanzyborrego.com

CERTIFICATE OF SERVICE

I hereby certify that I have served upon the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail a true and correct copy of the foregoing Response to Ronald Ingalls, Chapter 7 Trustee, P.O. Box 2867, Fredericksburg, Texas 78624-1927, to the U.S. Trustee's Office, 615 E. Houston, Ste 533, San Antonio, TX 78205-2055 and to Mr. and Mrs. JOSE A. DE SANTIAGO, 5664 Burning Tree Dr., El Paso, TX 79912 on day of 7th day of July 2020.

/s/Edgar J. Borrego

EDGAR J. BORREGO/MIGUEL A. FLORES

TB# 40032

tb/sv